

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

LASHUNDRA JACKSON,

Plaintiff,

v.

**STATE OF ALABAMA DEPARTMENT OF
TRANSPORTATION, JOE MCINNES, *etc.*,**

Defendants.

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CASE NO. 2:07-cv-645-MEF

**SECOND SUPPLEMENTAL EVIDENTIARY MATERIALS IN SUPPORT OF
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants State of Alabama Department of Transportation (hereinafter "ALDOT") and Joe McInnes submit the following evidentiary materials in support of their previously filed Motion for Summary Judgment (Doc No. 16) and their Reply to Plaintiff's Response in Opposition (Doc No. 23) to Defendants' Motion for Summary Judgment, which is being filed contemporaneously herewith:

DEFENDANTS' EXHIBITS

26. ALDOT Ninth Division, All Math Classes, January 1, 2002 – February 27, 2008;
27. Ninth Division Staff Meeting September 23, 2003, (notes);
28. Interview Form dated May 10, 2006;
29. December 19, 2006, Memorandum to File by Bret Paulk;
30. March 21, 2007, letter to Lisa S. Champagne, with attached page from Exhibit 26 and attached Probationary Performance Appraisal, dated September 14, 2007;
31. Excerpt of Deposition of Bret Paulk;
32. State Employee's Membership Status Change form, signed by Mary Weaver on April 17, 2003.

RESPECTFULLY SUBMITTED
TROY KING
ATTORNEY GENERAL

s/ Andrew W. Redd

Jim R. Ippolito, Jr. (IPP001)
Assistant Attorney General
Chief Counsel

Andrew W. Redd (RED001)
Jason A. Trippe (TRI012)
Assistant Attorneys General
Assistant Counsel

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**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

LASHUNDRA JACKSON,)	
)	
Plaintiff,)	
v.)	
)	CASE NO. 2:07-cv-645-MEF
STATE OF ALABAMA DEPARTMENT OF)	
TRANSPORTATION, JOE MCINNES, <i>etc.</i>,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that, on **June 24, 2008**, I electronically filed the foregoing with the Clerk of the Court using the CM/ECT system, which will send notification to the following:

Mr. Kell A. Simon, Esq.
Ross Melton, P.C.
1104 San Antonio Street
Austin, Texas 78701
ATTORNEY FOR PLAINTIFF

s/ Andrew W. Redd
Andrew W. Redd (RED001)
Assistant Attorney General
Assistant Counsel

ADDRESS OF COUNSEL:
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reda@dot.state.al.us

ALDOT Ninth Division

All Math Classes

January 1, 2002 - February 27, 2008

ID	Name	Course	Title	Start Date	Grade
083713	Adams, Terry Jerome	000168	Basic Mathematics	2005-05-16	FL
083965	Alexander, Danielle D	000168	Basic Mathematics	2005-05-16	P
083965	Alexander, Danielle D	000104	Algebra	2005-06-07	P
083965	Alexander, Danielle D	000505	Geometry	2006-01-09	P
083965	Alexander, Danielle D	001284	Trigonometry	2006-07-17	P
001633	Allison, Avery V	000168	Basic Mathematics	2003-05-19	P
001633	Allison, Avery V	000104	Algebra	2003-07-14	P
001633	Allison, Avery V	000505	Geometry	2005-07-18	P
001020	Andrews, Roger Dale	000104	Algebra	2005-06-07	FL
001020	Andrews, Roger Dale	000104	Algebra	2006-08-28	P
001020	Andrews, Roger Dale	000505	Geometry	2007-06-18	P
002525	Baker, Gary D	001284	Trigonometry	2005-12-05	FL
001494	Baskin, Kunta Kente	000168	Basic Mathematics	2004-04-19	P
094886	Blan JR, Gene N	000104	Algebra	2007-10-22	P
000585	Boone, Joel Q	000168	Basic Mathematics	2004-04-19	P
075088	Brinkman Jr, Allen W	000104	Algebra	2003-07-14	FL
075088	Brinkman Jr, Allen W	000104	Algebra	2005-06-07	P
075088	Brinkman Jr, Allen W	000505	Geometry	2005-07-18	P
075088	Brinkman Jr, Allen W	001284	Trigonometry	2005-12-05	FL
001522	Brown, Joel W	000104	Algebra	2003-02-10	P
001522	Brown, Joel W	000505	Geometry (In-Service Math Pro	2003-04-07	P
001522	Brown, Joel W	001284	Trigonometry	2003-05-12	P
001700	Burroughs, Randell L	000168	Basic Mathematics	2003-05-19	P
001700	Burroughs, Randell L	000104	Algebra	2003-07-14	P
001700	Burroughs, Randell L	000505	Geometry	2005-07-18	P
001700	Burroughs, Randell L	001284	Trigonometry	2005-12-05	FL
001700	Burroughs, Randell L	001284	Trigonometry	2006-07-17	P
009892	Cain, Maurice T	000104	Algebra	2003-02-10	FL
074999	Campbell, Michael G	000505	Geometry	2005-07-18	P
074999	Campbell, Michael G	001284	Trigonometry	2005-12-05	P
058389	Champagne, Lisa S	000168	Basic Mathematics	2007-07-16	P
058389	Champagne, Lisa S	000104	Algebra	2007-08-20	P
058389	Champagne, Lisa S	000505	Geometry	2007-11-05	P
084434	Chapple III, Mose	000168	Basic Mathematics	2006-02-13	P
084434	Chapple III, Mose	000104	Algebra	2006-08-28	P
084434	Chapple III, Mose	000505	Geometry	2007-06-18	P
084434	Chapple III, Mose	001284	Trigonometry	2007-07-23	P
001637	Clark, Peggy D	000104	Algebra	2003-02-10	P
001637	Clark, Peggy D	000505	Geometry (In-Service Math Pro	2003-04-07	P
009641	Clark, William H	000168	Basic Mathematics	2007-02-26	F
083762	Clement, Diana L	000104	Algebra	2005-06-07	P
083762	Clement, Diana L	000505	Geometry	2006-01-09	P
083762	Clement, Diana L	001284	Trigonometry	2006-07-17	P
075008	Cotton, Thomas S	000168	Basic Mathematics	2005-05-16	P
075008	Cotton, Thomas S	000104	Algebra	2005-06-07	P
075008	Cotton, Thomas S	000505	Geometry	2005-07-18	P
000628	Crook, Kenya Janice	000168	Basic Mathematics	2004-04-19	P

**DEFENDANT'S
EXHIBIT**

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ALDOT Ninth Division

All Math Classes

January 1, 2002 - February 27, 2008

ID	Name	Course	Title	Start Date	Grade
009991	Crosby,Randy D	000168	Basic Mathematics	2004-04-19	P
095057	Cunningham,Morrius A	000104	Algebra	2007-10-22	P
085070	Dees,Monica	000104	Algebra	2007-03-26	P
085070	Dees,Monica	000505	Geometry	2007-06-18	P
085070	Dees,Monica	001284	Trigonometry	2007-07-23	P
075113	Drakes,Carlton	000168	Basic Mathematics	2005-05-16	P
075113	Drakes,Carlton	000104	Algebra	2005-06-07	P
075113	Drakes,Carlton	000505	Geometry	2006-01-09	P
075113	Drakes,Carlton	001284	Trigonometry	2007-07-23	P
001806	Feagin-Sellers,Cynthia B	000168	Basic Mathematics	2003-05-19	P
001806	Feagin-Sellers,Cynthia B	000104	Algebra	2003-07-14	P
001806	Feagin-Sellers,Cynthia B	000505	Geometry	2005-07-18	P
001806	Feagin-Sellers,Cynthia B	001284	Trigonometry	2005-12-05	P
001845	Ferguson,Kathie H	000168	Basic Mathematics	2003-05-19	P
001845	Ferguson,Kathie H	000104	Algebra	2003-07-14	FL
001845	Ferguson,Kathie H	000104	Algebra	2005-06-07	P
001845	Ferguson,Kathie H	000505	Geometry	2005-07-18	P
001845	Ferguson,Kathie H	001284	Trigonometry	2005-12-05	FL
001845	Ferguson,Kathie H	001284	Trigonometry	2006-07-17	FL
020690	Ferrell,Dennis Ray	000104	Algebra	2006-10-30	P
001501	Fletcher,Debra	000104	Algebra	2003-02-10	P
001501	Fletcher,Debra	000505	Geometry (In-Service Math Pro	2003-04-07	P
001501	Fletcher,Debra	001284	Trigonometry	2003-05-12	P
085186	Fletcher,Jay M	000168	Basic Mathematics	2007-02-26	P
085186	Fletcher,Jay M	000104	Algebra	2007-03-26	P
085186	Fletcher,Jay M	000505	Geometry	2007-06-18	P
085186	Fletcher,Jay M	001284	Trigonometry	2007-07-23	P
020747	Frazier,William A	000168	Basic Mathematics	2003-05-19	P
020747	Frazier,William A	000104	Algebra	2003-07-14	P
020747	Frazier,William A	000505	Geometry	2005-07-18	P
020747	Frazier,William A	001284	Trigonometry	2005-12-05	FL
020747	Frazier,William A	001284	Trigonometry	2006-07-17	P
001279	Fuller,Anthony M	000168	Basic Mathematics	2002-12-02	P
001279	Fuller,Anthony M	000104	Algebra	2003-02-10	P
001422	Ganey,Patrisha J	000104	Algebra	2003-02-10	P
001422	Ganey,Patrisha J	000505	Geometry (In-Service Math Pro	2003-04-07	P
001422	Ganey,Patrisha J	001284	Trigonometry	2003-05-12	P
023077	Gradick III,William H	001284	Trigonometry	2003-05-12	P
083959	Griffin,Patricia A	000168	Basic Mathematics	2005-05-16	P
083959	Griffin,Patricia A	000104	Algebra	2005-06-07	P
083959	Griffin,Patricia A	000505	Geometry	2006-09-18	P
083964	Guthrie,David A	000168	Basic Mathematics	2005-05-16	P
083964	Guthrie,David A	000104	Algebra	2005-06-07	P
083964	Guthrie,David A	000505	Geometry	2006-01-09	P
083964	Guthrie,David A	001284	Trigonometry	2007-07-23	F
074990	Hansworth,Floyd J	000168	Basic Mathematics	2004-04-19	P
074990	Hansworth,Floyd J	000104	Algebra	2005-06-07	P

ALDOT Ninth Division

All Math Classes

January 1, 2002 - February 27, 2008

ID	Name	Course	Title	Start Date	Grade
074990	Hansworth,Floyd J	000505	Geometry	2005-07-18	FL
074990	Hansworth,Floyd J	000505	Geometry	2006-01-09	P
074990	Hansworth,Floyd J	001284	Trigonometry	2006-07-17	P
001648	Havard,Joshua Owen	000505	Geometry	2006-01-09	P
001648	Havard,Joshua Owen	001284	Trigonometry	2006-07-17	P
026866	Haywood,James L	000168	Basic Mathematics	2004-04-19	FL
001532	Hollinger Sr,Eric Lushune	000168	Basic Mathematics	2004-04-19	FL
001645	Hollinger,Anthony Delee	000168	Basic Mathematics	2005-05-16	FL
009990	Howard,Caesar Edward	000168	Basic Mathematics	2004-04-19	FL
027048	Howard,Johnny R	000168	Basic Mathematics	2006-02-13	P
000997	Hunter,Gwenda K	000168	Basic Mathematics	2002-12-02	P
000997	Hunter,Gwenda K	000104	Algebra	2003-07-14	FL
033631	Isaac,George C	000168	Basic Mathematics	2007-07-09	P
033631	Isaac,George C	000104	Algebra	2007-08-20	FL
033631	Isaac,George C	000104	Algebra	2007-10-22	P
084812	Jackson,Lashundra M	000168	Basic Mathematics	2006-10-10	P
001479	Jackson,Melvin	000104	Algebra	2003-02-10	P
001479	Jackson,Melvin	000505	Geometry (In-Service Math Pro	2003-04-07	P
001479	Jackson,Melvin	001284	Trigonometry	2003-05-12	P
001765	Johns,Joshua R	000104	Algebra	2003-07-14	P
001765	Johns,Joshua R	000505	Geometry	2005-07-18	P
001765	Johns,Joshua R	001284	Trigonometry	2005-12-05	FL
001765	Johns,Joshua R	001284	Trigonometry	2006-07-17	P
084024	Johnson,Kenneth M	000168	Basic Mathematics	2007-07-09	P
084024	Johnson,Kenneth M	000104	Algebra	2007-08-20	P
000684	Johnston,Richard A	000104	Algebra	2003-02-10	P
000684	Johnston,Richard A	000505	Geometry (In-Service Math Pro	2003-04-07	P
000684	Johnston,Richard A	001284	Trigonometry	2003-05-12	FL
000684	Johnston,Richard A	001284	Trigonometry	2005-12-05	FL
000684	Johnston,Richard A	001284	Trigonometry	2006-07-17	P
095006	Jones,Rafael A	000168	Basic Mathematics	2007-09-24	P
095006	Jones,Rafael A	000104	Algebra	2007-10-22	FL
036458	Kelley,Gary M	000104	Algebra	2003-02-10	P
036458	Kelley,Gary M	000505	Geometry	2006-05-22	P
036458	Kelley,Gary M	000505	Geometry (In-Service Math Pro	2003-04-07	FL
036458	Kelley,Gary M	001284	Trigonometry	2006-07-17	P
001777	Landrum,Larry R	000104	Algebra	2003-07-14	FL
000967	Lee,Joseph B	000168	Basic Mathematics	2002-12-02	P
000967	Lee,Joseph B	000104	Algebra	2003-02-10	FL
000967	Lee,Joseph B	000104	Algebra	2003-07-14	FL
084101	Lee,Shannon N	000104	Algebra	2006-05-01	P
084101	Lee,Shannon N	000505	Geometry	2007-06-18	P
084101	Lee,Shannon N	001284	Trigonometry	2007-07-23	P
084293	Lopez Jr,Victor Raul	000168	Basic Mathematics	2007-02-26	P
084293	Lopez Jr,Victor Raul	000104	Algebra	2007-03-26	P
084293	Lopez Jr,Victor Raul	000505	Geometry	2007-06-18	P
084293	Lopez Jr,Victor Raul	001284	Trigonometry	2007-07-23	P

ALDOT Ninth Division

All Math Classes

January 1, 2002 - February 27, 2008

ID	Name	Course	Title	Start Date	Grade
084636	Lowery,Trenton E	000168	Basic Mathematics	2006-08-07	P
084636	Lowery,Trenton E	000104	Algebra	2006-08-28	P
084636	Lowery,Trenton E	000505	Geometry	2007-06-18	P
084811	Majercik,John C	000104	Algebra	2006-08-28	FL
084811	Majercik,John C	000104	Algebra	2006-10-30	P
084811	Majercik,John C	000505	Geometry	2007-06-18	P
084811	Majercik,John C	001284	Trigonometry	2007-07-23	FL
084458	Malone,Jason Leebaron	000168	Basic Mathematics	2007-07-09	P
084458	Malone,Jason Leebaron	000104	Algebra	2007-08-20	P
084458	Malone,Jason Leebaron	000505	Geometry	2007-11-05	P
000906	Manuel,Beatrice C	000168	Basic Mathematics	2002-12-02	P
000906	Manuel,Beatrice C	000104	Algebra	2003-02-10	FL
000906	Manuel,Beatrice C	000104	Algebra	2003-07-14	FL
000906	Manuel,Beatrice C	000104	Algebra	2005-06-07	P
000906	Manuel,Beatrice C	000505	Geometry	2006-01-09	FL
084268	McNorton Jr,Samuel Todd	000168	Basic Mathematics	2006-08-07	P
084268	McNorton Jr,Samuel Todd	000104	Algebra	2006-08-28	P
084268	McNorton Jr,Samuel Todd	000505	Geometry	2007-06-18	P
041835	Mitchell,Edward L	000104	Algebra	2003-02-10	FL
020647	Molsbee,Tommie J	000104	Algebra	2003-02-10	FL
020647	Molsbee,Tommie J	000104	Algebra	2003-07-14	FL
020647	Molsbee,Tommie J	000104	Algebra	2005-06-07	P
020647	Molsbee,Tommie J	000505	Geometry	2005-07-18	FL
000804	Nash,Lawrence F	000168	Basic Mathematics	2002-12-02	P
000804	Nash,Lawrence F	000104	Algebra	2003-02-10	P
001644	O'Rourke,Dianna W	000104	Algebra	2003-02-10	FL
001644	O'Rourke,Dianna W	000104	Algebra	2003-07-14	P
001644	O'Rourke,Dianna W	000505	Geometry	2005-07-18	P
001644	O'Rourke,Dianna W	001284	Trigonometry	2005-12-05	P
075741	Payne Sr,Demetrius Larussell	000168	Basic Mathematics	2005-05-16	P
084632	Pettway,Randy	000505	Geometry	2006-05-22	P
084632	Pettway,Randy	001284	Trigonometry	2006-07-17	P
083731	Pettway,Rickey	000168	Basic Mathematics	2005-05-16	P
050433	Poiroux Jr,Joseph A	000104	Algebra	2003-02-10	P
050433	Poiroux Jr,Joseph A	000505	Geometry (In-Service Math Pro	2003-04-07	P
050433	Poiroux Jr,Joseph A	001284	Trigonometry	2005-12-05	FL
050433	Poiroux Jr,Joseph A	001284	Trigonometry	2007-07-23	P
075653	Powell,Belinda J	000505	Geometry	2006-01-09	P
075653	Powell,Belinda J	001284	Trigonometry	2006-07-17	P
000999	Presley,Phillip D	000168	Basic Mathematics	2002-12-02	P
000999	Presley,Phillip D	000104	Algebra	2003-02-10	P
000999	Presley,Phillip D	000505	Geometry (In-Service Math Pro	2003-04-07	P
000999	Presley,Phillip D	001284	Trigonometry	2003-05-12	P
084805	Reed,Darrin D	000104	Algebra	2006-08-28	P
084805	Reed,Darrin D	000505	Geometry	2007-06-18	P
084805	Reed,Darrin D	001284	Trigonometry	2007-07-23	P
001851	Reed,Marilyn E	000104	Algebra	2003-07-14	FL

ALDOT Ninth Division

All Math Classes

January 1, 2002 - February 27, 2008

ID	Name	Course	Title	Start Date	Grade
085211	Roberts, Charles A	000505	Geometry	2007-06-18	P
085211	Roberts, Charles A	001284	Trigonometry	2007-07-23	P
084634	Robinson, Dejuan P	000168	Basic Mathematics	2006-08-07	P
084634	Robinson, Dejuan P	000505	Geometry	2007-06-18	P
084634	Robinson, Dejuan P	001284	Trigonometry	2007-07-23	P
000734	Rodgers, Lois Jean	000168	Basic Mathematics	2002-12-02	P
000734	Rodgers, Lois Jean	000104	Algebra	2003-02-10	FL
000734	Rodgers, Lois Jean	000104	Algebra	2003-07-14	FL
054610	Rudolph, Patricia A	000168	Basic Mathematics	2004-04-19	P
191270	Ryals, Dustan Devon	000168	Basic Mathematics	2006-02-13	FL
191270	Ryals, Dustan Devon	000168	Basic Mathematics	2006-08-07	FL
001639	Skipper, Earston E	000168	Basic Mathematics	2003-05-19	P
001639	Skipper, Earston E	000104	Algebra	2003-07-14	P
001639	Skipper, Earston E	000505	Geometry	2005-07-18	FL
001639	Skipper, Earston E	000505	Geometry	2006-01-09	P
000710	Smith, Marcus E	000104	Algebra	2003-02-10	P
000710	Smith, Marcus E	000505	Geometry (In-Service Math Pro	2003-04-07	P
000710	Smith, Marcus E	001284	Trigonometry	2005-12-05	P
001447	Snyder, Brandon T	000104	Algebra	2003-02-10	P
001447	Snyder, Brandon T	000505	Geometry (In-Service Math Pro	2003-04-07	P
001447	Snyder, Brandon T	001284	Trigonometry	2003-05-12	FL
001447	Snyder, Brandon T	001284	Trigonometry	2005-12-05	P
001831	Stagner, Marian L	000168	Basic Mathematics	2003-05-19	P
001831	Stagner, Marian L	000104	Algebra	2003-07-14	P
001831	Stagner, Marian L	000505	Geometry	2005-07-18	P
001831	Stagner, Marian L	001284	Trigonometry	2005-12-05	P
075087	Stevenson, Jesse Lee	000168	Basic Mathematics	2007-02-26	P
000731	Stinson, Hank C	000104	Algebra	2003-02-10	P
000731	Stinson, Hank C	000505	Geometry (In-Service Math Pro	2003-04-07	P
000731	Stinson, Hank C	001284	Trigonometry	2003-05-12	FL
000731	Stinson, Hank C	001284	Trigonometry	2005-12-05	P
084108	Watson, Ronto D	000168	Basic Mathematics	2005-10-31	P
001425	Weaver, Mary K	001284	Trigonometry	2005-12-05	P
001816	West, Andrew D	000104	Algebra	2003-07-14	P
001816	West, Andrew D	000505	Geometry	2005-07-18	P
001816	West, Andrew D	001284	Trigonometry	2005-12-05	P
069390	Witherspoon, Raymond	000168	Basic Mathematics	2004-04-19	FL
001254	Yarbrough, Blakely Thomas	000168	Basic Mathematics	2004-04-19	P
001254	Yarbrough, Blakely Thomas	000104	Algebra	2005-06-07	P
001254	Yarbrough, Blakely Thomas	000505	Geometry	2005-07-18	P
001254	Yarbrough, Blakely Thomas	001284	Trigonometry	2005-12-05	P



GOVERNOR

ALABAMA
DEPARTMENT OF TRANSPORTATION

NINTH DIVISION
OFFICE OF DIVISION ENGINEER
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JOE MCNEEL
TRANSPORTATION DIRECTOR

Alabama Department of Transportation
Ninth Division
Staff Meeting
September 22, 2003

Attendees:	R. F. Poiroux	Ken Owens	Leon Malone
	Vince Calametti	Matt Ericksen	Iris Malone
	Jackie Glasgow	Dewayne Hood	
	Steve Watkins	Jeannette Brown	
	Nick Amberger	Mark Alford	

A meeting was called September 22, 2003, by Mr. Poiroux to discuss the following issues:

1. Mandatory Compliance with Article Seven of Consent Decree

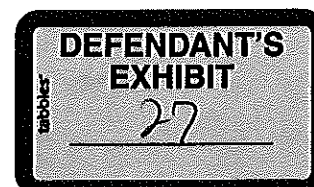
Mr. Poiroux asked Mrs. Brown to explain the procedure regarding the submittal of the Request to Fill/not to Fill or Abolishment forms. Mrs. Brown indicated that she relies on the supervisors to inform her when an employee separates from our Department. She indicated that the form must be in her office three days after the employee resigns, retires, transfers, promotions, etc., in order for to have this form in Montgomery within seven days. Mr. Poiroux revealed that this procedure is not sufficient. He asked Mrs. Brown to develop another procedure. Mrs. Brown asked for suggestions? Staff members stated that "they would ensure that she receives notification regarding the Request to Fill/not to Fill or Abolishment Form in advance". In addition, Mrs. Brown advised the staff that it is very important that we establish a "zero tolerance" policy for the submission of this form. Mr. Poiroux informed the staff that failure to forward this form in a timely manner will result in the violation of article seven of the Consent Decree; and it could result in disciplinary action.

Processing of the Certificate of Eligibles – Mrs. Brown indicated that once this list is in, she has five days to submit the availability letters; ten days to receive responses from applicants; give applicants five days after the ten days to respond; get SOI questions ready to interview applicants; and after interview is completed, list must be processed within two weeks and forwarded to Montgomery with the applicant (s) selected to be employed. Mrs. Brown stated that "there are more steps to follow, but will not go into depth due to too many steps." She indicated that all minorities must be interviewed if they marked that they are available on the Availability Letter. In addition, Mrs. Brown advised that there are no delays when processing COE's, because this takes top priority. The staff members were informed that State Personnel will not accept any delays when processing the COE's. Also, she revealed that if this directive is not followed, it would be considered a direct violation of the State Personnel Department's policy. Mr. Poiroux requested that the Personnel Rules and Regulations Policy be kept on each desk at all times in order for staff to be able to know what type of action to take in this matter.

2. Department Examination and Structured Interview Security – We were advised by Mr. Poiroux that the above-mentioned security is very important. Mrs. Brown indicated that it is very imperative that we protect the confidentiality of the questions regarding the Structured Oral Interview. A question was asked, how would the interviewer know if the SOI questions have been used by another Department before interviewing the applicant? Mrs. Brown


R. F. Poiroux, P.E.
Division Engineer

RFP/irm
c: Staff Members
File



Staff Meeting
 September 22, 2003
 Page 2

stated that "she would indicate on the Availability Letter a "box "for the applicants to check whether or not they have been interviewed under the SOI status." Mr. Glasgow informed Mr. Poiroux and Mrs. Brown that he has not had the SOI Training, as well as, Mr. Brent Maddox. Therefore, Mr. Poiroux asked Mrs. Brown to get them scheduled as soon as possible. A question asked, what is the expiration date regarding Structured Oral Interview? Mrs. Brown stated that "she would check with, Mrs. Vivian Handy, Personnel Office, on the expiration date (would like to know if the expiration is good for two (2) years) and how long do you wait to interview?" Mr. Poiroux informed Mrs. Brown that he would like a letter to be written regarding her findings. Mr. Ken Owens informed the staff that he has not had Performance Appraisal Training. Mr. Poiroux asked Mrs. Brown to have him scheduled as soon as possible for this training. Mrs. Brown advised that she would get Debra Hadley to call Mr. Willie Franklin of the Training Bureau to set up this training.

3. **Departmental Policy Regarding Personal Use of State Cellular Telephones** – The staff members were told by Mr. Poiroux not to let the use of their cellular phone get out of hand. He indicated that you may use the phone if it is of a personal matter if working late, etc.
4. **Career Path Videos**- Mrs. Debra Hadley indicated to staff members that it is mandatory that each employee is made aware of the career path videos. She stated that "the Career Path Program is a part of our Consent Decree and must be offered each year." These videos are set up for the months of July and August. Mr. Poiroux indicated that he would like for these videos to be set up during the winter months. He asked Mrs. Brown to get with Mrs. Hadley to see if she could get these videos scheduled for the winters along with sending the video schedule to the employees; to see if Mrs. Hadley could setup the video tapes for each office, which should be cleared by each supervisor; and would like for her to make phone calls instead of emailing the supervisors in order to make sure the supervisor understands what it scheduled for our employees. In addition, Mr. Poiroux would like Mrs. Hadley to see if Mr. Maddox and Mr. Watkins could setup their own Career Path Videos in their Districts.
5. **FE&PE Courses** – Mr. Poiroux advised staff members that they need to check with their employees to see if they want to attend these courses. Mrs. Debra Hadley has a list for you to check "yes or no" and will process the rest of the data. Since this is dealing with the Court Decree, Mr. Poiroux stated, "He wants to sign documentations for these courses." Also, Mr. Poiroux would like Mr. Don Powell to call and check with employees to see if they are interested in taking these exams.
6. **Job Applications** – The staff members were informed by Mr. Poiroux that he does not want us accepting applications from applicants and submitting them to State Personnel with the exception of clerical aides, laborers, and seasonal laborers.
7. **State Employee Report of Injury** – It was indicated to the staff by Mrs. Brown that the SEICTF form is being turned in too late to the Personnel/Payroll/Workman's Compensation Office. Also, she stated that "all restrictions must be approved by Mr. Poiroux." If he is on leave, please get with Mr. Calametti."
8. **Payroll Checks** – Mrs. Brown informed staff members that all payroll checks will be submitted to the supervisors' offices. In order for the Personnel Office to know where your employee(s) is located, you will need to submit to her office copies of the reassignment letters advising her staff where the employees are located; and so that the organization chart can be updated to reflect these changes.

Staff Meeting
September 22, 2003
Page 3

Object Codes – Mrs. Brown indicated that the object codes are being turned in wrong. The wrong code is being used by secretaries/supervisors. Mr. Poiroux asked Mrs. Brown to call Mrs. Diana Henley to set up training regarding the above-mentioned subject so that the new secretaries can be trained in this capacity.

9. **Functional Analysis and Records Disposition Authority** – Mr. Calametti informed the staff that the Functional Analysis and Records Disposition documentation has been approved by Mr. Dykes Rushing. He informed the staff members that the Division has to appoint a Record Officer to keep these records. Mr. Poiroux appointed Mrs. Jeannette Brown to be in charge of these records.
10. **Construction Personnel** – Mr. Calametti informed the staff that there is a huge transition in Construction. He indicated that we really need to work closely with the new employees. Mr. Poiroux stated that "Mr. Leon Malone is expected to provide assistance to the staff. He is going to get out in the Districts, project offices, etc., and talk with the engineers/supervisors regarding problems that may have occurred with their employees."
11. **Training Report** – Mrs. Debra Hadley advised the staff members that training reports are not being submitted on new secretaries, laborers, etc. Mrs. Hadley indicated that these employees are not getting credit for this training. Also, she informed the staff that these training reports are due on the 15th of each month. Mrs. Hadley advised that she has not received any training reports on secretaries, EA's, CE's, etc. She stated that, "a check-off list 'will be utilized in the future". In addition, she is not receiving memo's, letters, etc., regarding various training. Mr. Poiroux advised the staff to submit copies of the sign-in-sheets, agendas, letters, etc., to Mrs. Hadley in the future.
12. **EDP Report** - Mrs. Hadley indicated to the staff members that supervisors are not turning in the EDP reports in a timely manner. These reports must be turned in reflecting the training they have received. She stated that, "the Tunnel employees need to be checked on as for as EDP approval for training". She also indicated that their Form 40's & 13 P's can be revised at anytime. Mrs. Hadley stated that "these forms can be added to or a new one can be prepared".

Math Classes – Mrs. Hadley indicated that the new EA's (six (6) months) must attend the Basic Math and Algebra Classes. Their grades will be forwarded to Mr. Poiroux and the project Engineers. If the EA does not take and pass Basic Math, his/her probationary period will be extended for three months. In addition, she informed that the Training Bureau sets up the Basic Math classes; therefore, if there is a problem, get with Mr. Poiroux. If the employee can not pass Basic Math, Mr. Poiroux will need to write a letter to Mr. Dan Morris. Mr. Poiroux informed the staff members that if the employee can not pass Basic Math, we do not need to keep him/her.

Meeting adjourned at 10:30 a.m.

R. F. Poiroux, P.E.
Division Engineer

RFP/irm
c: Staff Members
File

STATE OF ALABAMA)
)
COUNTY OF MOBILE)

CERTIFICATION OF BUSINESS RECORDS

My name is Jeannette Brown. I am employed as the Transportation Office Manager of the Alabama Department of Transportation in Mobile, Alabama.

I hereby certify that the attached certifications are a true and accurate copy of The Department of Transportation's Ninth Division Staff Meeting Minutes dated September 22, 2003, which is kept in the regular course of business.

Jeannette Brown
Jeannette Brown
Transportation Office Manager

SWORN TO AND SUBSCRIBED BEFORE ME, this the 23rd day of June, 2008.

Betty Dean
NOTARY PUBLIC

MY COMMISSION EXPIRES:

3/21/09

Revised: June 15, 2005

INTERVIEW FORM

This interview form must be used and filled out in all interviews of applicants for all positions. The purpose of the form is to comply with the provision of the Consent Decree on the subject of conducting objective, non-discriminatory job interviews. Paragraph 5, Article VIII provides that: "The Department of Transportation will develop and use forms to be filled out by the interviewer or interviewers which will list the job-related qualifications of each eligible interviewed". Additional purposes of the form are to comply with the Americans with Disabilities Act and prevent all other forms of hiring discrimination.

A. GENERAL INFORMATION:

1. PCQ #s: 1736115, 1902800, 1926900, 1948102
2. Name: LASHUNDRA YATES
3. Address: 714 S CEDAR ST.
MOBILE, AL 36603
4. Telephone number(s) where you can be reached: (251) 441-8933^H 406-5013^C
5. SSN: 422-02-6779

B. PRIOR WORK EXPERIENCE:

1. Where have you worked? BERNARDS CONTRACTING; SEE APPLICATION FOR OTHERS.
2. At each place of employment, what job title(s) did you hold? OFFICE ASSISTANT
3. As to each job, what duties and responsibilities did you have in that job? FILE, ANSWERING PHONE, CONFIRMING APPOINTMENTS, FAXING, ETC.

(Add additional sheets if necessary)

4. Is there anything else about your work history that we have not discussed that would enable you to better perform the job?

NO**DEFENDANT'S
EXHIBIT**28

LISHUNDRA VATES
Applicant's Name

C. VOCATIONAL TRAINING:

1. Have you had vocational or trade training? _____ Yes ☒ No
2. If so, where did you have the training? _____

3. For how long did you receive that training? _____
4. What vocational field was the training in? _____
5. Did you complete the course? _____ Yes _____ No
6. Do you have a certificate relating to the training? _____ Yes _____ No

D. MILITARY SERVICE

1. Have you been in the military service? _____ Yes ☒ No
2. If so, what was your primary MOS (Military Occupational Specialty)?

3. Did you have a secondary MOS? _____ Yes _____ No
If so, what was it? _____
4. Did you have any occupational or vocational training in the service? _____ Yes _____ No
If so, what was the training in? _____

E. EDUCATION:

If job does not require at least a high school diploma, DO NOT ask about applicant's educational attainments. Applicant may be asked about educational attainments if it has been validated by the State Personnel Department that a high school diploma or GED is required for the job.

For jobs requiring a college degree, the following questions can be asked:

1. What field of study do you have your degree in? _____

LASHUNDA VATES

Applicant's Name

2. What college courses have you taken related to? _____
(fill in the job classification you are interviewing for)
3. Do you have any post-graduate degree or course work related to? _____
(fill in the job classification you are interviewing for)
4. For non-degree jobs involving the use of math, ask what math courses the applicant has taken and passed (explain that a high school diploma or GED is not required).
5. Can you produce or provide an official transcript or other official proof of math courses taken showing your grades? _____ Yes _____ No

Comments: _____

F. JOB DIMENSIONS:

The job you are applying for requires the following job dimensions to be performed to a fully competent level in the position for which the interview is being held. The following is a list of the job dimensions including essential functions, knowledge, position capabilities, behavioral qualities and environmental factors.

- | | | |
|--|---|-----------|
| 1. <u>Communicates</u> | 11. <u>operations</u> | 21. _____ |
| 2. <u>Enters data</u> | 12. <u>Operates vehicles/ equipment</u> | 22. _____ |
| 3. <u>Fills out documents</u> | 13. <u>Maintains survey equipment</u> | 23. _____ |
| 4. <u>Gathers information</u> | 14. <u>Participates in training</u> | 24. _____ |
| 5. <u>Monitors/ observes construction activities</u> | 15. <u>Clears/stakes survey lines</u> | 25. _____ |
| 6. <u>Performs tests</u> | 16. _____ | 26. _____ |
| 7. <u>Test materials</u> | 17. _____ | 27. _____ |
| 8. <u>Reviews/ reads plans/ spec., etc.</u> | 18. _____ | 28. _____ |
| 9. <u>Draws/ plots profiles, etc.</u> | 19. _____ | 29. _____ |
| 10. _____ | 20. _____ | 30. _____ |

(Add additional sheets if needed.)

LASHUNDRA YATES
Applicant's Name

List the prewritten interview questions that were developed for the interview during the research phase. Ask each applicant all questions. The questions are to be directly related to the list of requirements needed for the position as listed above. Record applicant answers on an additional sheet corresponding the correct number and question to the right answer. This answer sheet is to be attached to the Interview Form. Do not forget to record the applicant's name and social security number on each additional answer sheet.

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.
- 11.
- 12.
- 13.
- 14.
- 15.
- 16.
- 17.
- 18.

(Add additional sheets if needed.)

LASHUNDRA VATES
Applicant's Name

ASK THIS QUESTION: Do you know of any reason that you could not perform these functions of this job, with or without reasonable accommodations that I have listed and described to you? _____ Yes ☒ No

G. WORK CONDITIONS:

- Describe work condition: You would be required to fulfill the duties of this position in a particular work environment. The condition involves:
_____ (e.g. sitting, standing, walking, climbing) and
_____ (e.g. working indoors or outdoors) and
_____ (use of what equipment and machinery).
- The work hours required for this job are 7AM-4PM and
(☐ no ☐ some ☐ extensive) overnight travel with
(☐ no ☐ some ☐ extensive) overnight and/or weekend work required).
- Ask this question: Do you know of any reason that you could not perform the functions of this job, with or without reasonable accommodations, that I have described to you under the conditions and work environment that I have just explained to you? _____ Yes ☒ No
- Do you know of any reason that you would not be able to be at your assigned workplace on a regular basis and perform all of the tasks that have been explained to you? _____ Yes ☒ No
If yes, explain: _____

H. LEAVE AND BENEFITS:

- Do you understand about the accumulation of sick and annual leave, other benefits, and about the delay between work performed and pay received? ☒ Yes _____ No

I. ADDITIONAL TRAINING, EXPERIENCE, AND/OR SCHOOLING:

- Is there anything else about your work history, training or experience that would enable you to better perform the tasks I have described to you? NO
- Have you ever received any special honors, recognitions, awards, promotions, acknowledgement of achievements or have you held any offices that would relate in any way to the job for which you are being interviewed today? _____ Yes ☒ No

Comments: _____

- Do you know of any other reason or fact about yourself that would make you especially qualified for the job for which you are interviewing? ☒ Yes _____ No

EASY LEARNER,

LASHUNDRA YATES
Applicant's Name

J. APPLICANT'S INTEREST IN CONTINUING CONSIDERATION FOR POSITION:

Based on the description of the job duties and responsibilities presented to me during my interview on this date, I would like to:

☒ Continue to be considered for position(s); or

☐ Remove my name for consideration for this position.

Lashundra Yates
Applicant's Signature

5/10/06
Date

VERA MILHOUSE
Interviewer #1 - Printed Name

Vera M
Signature

AFR AMR
Race

5/10/06
Date

JOE FRESOLONE
Interviewer #2 - Printed Name

J.F.
Signature

WHITE
Race

5/10/06
Date

JOE FRESOLONE
Interviewer #3 - Printed Name

J.F.
Signature

WHITE
Race

5/10/06
Date

Mobile AL
Location of Interview

Interviewer #4 - Printed Name

Signature

Race

Date



BOB RILEY
GOVERNOR

**ALABAMA
DEPARTMENT OF TRANSPORTATION**

NINTH DIVISION
OFFICE OF DIVISION ENGINEER
1701 I-65 WEST SERVICE ROAD N
MOBILE, ALABAMA 36618-1109
Telephone: (251) 470-8200
Fax: (251) 473-3824



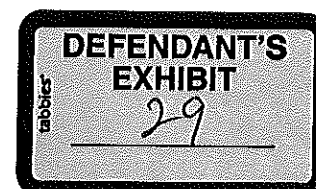
JOH McINNERS
TRANSPORTATION DIRECTOR

MEMORANDUM

DATE: December 19, 2006
TO: File
FROM: Bret Paulk B.E.
Project Engineer
RE: LaShundra Jackson – Probation Extension

LaShundra Jackson is required to attend both the Basic Math and Algebra courses as part of the new Engineering Assistant Orientation. Mrs. Jackson failed to attend Algebra within her first 6 months of employment; therefore it is recommended that the employee's probation be extended for a period of 3 months.

c: Mr. Jay Palmer
File





BOB RILEY
GOVERNOR

March 21, 2007

ALABAMA DEPARTMENT OF TRANSPORTATION

NINTH DIVISION
OFFICE OF DIVISION ENGINEER
1701 I-65 WEST SERVICE ROAD N
MOBILE, ALABAMA 36618-1109
TELEPHONE: (251) 470-8200
FAX: (251) 473-3624



JOE MCINNES
TRANSPORTATION DIRECTOR

Mrs. Lisa S. Champagne
5468 Marlowe Dr
Satsuma, AL 36572

Job Classification: Engineering Assistant
Semi- Monthly Entrance Salary: \$933.20
Salary Range: \$933.20 - \$1419.30
Location: Mobile
Number of Vacancies: 2
Rank: 2

Dear Mrs. Champagne:

I am pleased to inform you that upon recommendation of this office and approval by Mr. D. J. McInnes, Transportation Director, you have been certified for appointment in the Classification of Engineering Assistant in the Ninth Division of the Alabama Department of Transportation effective **April 1, 2007**. Your salary will be \$933.20 semi-monthly. You should report to Debra Hadley at 8:00 a.m on April 2, 2007 to complete your new employee paper work and receive your math placement test. You may bring a scientific calculator if you choose. Upon completion of the new employee information you will report to Mr. Joshua McElhenney, Project Engineer, to receive your job assignment.

You will serve in the Engineering Assistant Classification on a probationary (trial) basis for a period of six months during which time your work habits and job responsibilities will be carefully observed. If, during the probationary period, your services are satisfactory, you will receive full merit system status at the end of the six months.

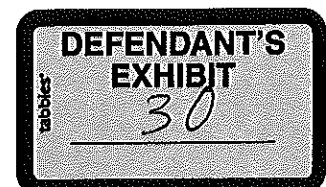
Congratulations on your appointment.

Sincerely,

Jeannette Brown
Transportation Office Manager

JB/jb

c: Mr. V. E. Calametti
Mr. S. J. Palmer
Mr. J. McElhenney
Mrs. Debra Hadley
Personnel File
Payroll Clerk
File (1948000)



ALDOT Ninth Division
All Math Classes
January 1, 2002 - February 27, 2008

ID	Name	Course	Title	Start Date	Grade
083713	Adams, Terry Jerome	000168	Basic Mathematics	2005-05-16	FL
083965	Alexander, Danielle D	000168	Basic Mathematics	2005-05-16	P
083965	Alexander, Danielle D	000104	Algebra	2005-06-07	P
083965	Alexander, Danielle D	000505	Geometry	2006-01-09	P
083965	Alexander, Danielle D	001284	Trigonometry	2006-07-17	P
001633	Allison, Avery V	000168	Basic Mathematics	2003-05-19	P
001633	Allison, Avery V	000104	Algebra	2003-07-14	P
001633	Allison, Avery V	000505	Geometry	2005-07-18	P
001020	Andrews, Roger Dale	000104	Algebra	2005-06-07	FL
001020	Andrews, Roger Dale	000104	Algebra	2006-08-28	P
001020	Andrews, Roger Dale	000505	Geometry	2007-06-18	P
002525	Baker, Gary D	001284	Trigonometry	2005-12-05	FL
001494	Baskin, Kunta Kente	000168	Basic Mathematics	2004-04-19	P
094886	Blan JR, Gene N	000104	Algebra	2007-10-22	P
000585	Boone, Joel Q	000168	Basic Mathematics	2004-04-19	P
075088	Brinkman Jr, Allen W	000104	Algebra	2003-07-14	FL
075088	Brinkman Jr, Allen W	000104	Algebra	2005-06-07	P
075088	Brinkman Jr, Allen W	000505	Geometry	2005-07-18	P
075088	Brinkman Jr, Allen W	001284	Trigonometry	2005-12-05	FL
001522	Brown, Joel W	000104	Algebra	2003-02-10	P
001522	Brown, Joel W	000505	Geometry (In-Service Math Pro	2003-04-07	P
001522	Brown, Joel W	001284	Trigonometry	2003-05-12	P
001700	Burroughs, Randell L	000168	Basic Mathematics	2003-05-19	P
001700	Burroughs, Randell L	000104	Algebra	2003-07-14	P
001700	Burroughs, Randell L	000505	Geometry	2005-07-18	P
001700	Burroughs, Randell L	001284	Trigonometry	2005-12-05	FL
001700	Burroughs, Randell L	001284	Trigonometry	2006-07-17	P
009892	Cain, Maurice T	000104	Algebra	2003-02-10	FL
074999	Campbell, Michael G	000505	Geometry	2005-07-18	P
074999	Campbell, Michael G	001284	Trigonometry	2005-12-05	P
058389	Champagne, Lisa S	000168	Basic Mathematics	2007-07-16	P
058389	Champagne, Lisa S	000104	Algebra	2007-08-20	P
058389	Champagne, Lisa S	000505	Geometry	2007-11-05	P
084434	Chapple III, Mose	000168	Basic Mathematics	2006-02-13	P
084434	Chapple III, Mose	000104	Algebra	2006-08-28	P
084434	Chapple III, Mose	000505	Geometry	2007-06-18	P
084434	Chapple III, Mose	001284	Trigonometry	2007-07-23	P
001637	Clark, Peggy D	000104	Algebra	2003-02-10	P
001637	Clark, Peggy D	000505	Geometry (In-Service Math Pro	2003-04-07	P
009641	Clark, William H	000168	Basic Mathematics	2007-02-26	F
083762	Clement, Diana L	000104	Algebra	2005-06-07	P
083762	Clement, Diana L	000505	Geometry	2006-01-09	P
083762	Clement, Diana L	001284	Trigonometry	2006-07-17	P
75008	Cotton, Thomas S	000168	Basic Mathematics	2005-05-16	P
75008	Cotton, Thomas S	000104	Algebra	2005-06-07	P
75008	Cotton, Thomas S	000505	Geometry	2005-07-18	P
00628	Crook, Kenya Janice	000168	Basic Mathematics	2004-04-19	P

GHR

Form 13F
Revised (01/2006)EMPLOYEE PERFORMANCE PROBATIONARY
STATE OF ALABAMA
Personnel Department

APPROVED

APPROVED

09/13/07

Employee Name: LISA S CHAMPAGNESocial Security Number: XXX-XX-5521Agency: 012/TRANSPORTATIONDivision: 0090/9TH DIVISION - MOBILEClassification: ENGINEERING ASSISTANTClass Code: 20111Period Covered From: 04/02/2007 To: 10/01/2007Position Number: 1948000

APPRAISAL SIGNATURES: Signatures are to be provided after the form has been completed. Signatures denote supervisor and employee discussion and receipt of form, not agreement. All signatures are mandatory.

Rating Supervisor	Employee	Reviewing Supervisor
SSN <u>XXX-XX-4904</u>		SSN <u>XXX-XX-4593</u>
<u>Bret Paulk</u> Rater Signature	<u>Lisa S. Champagne</u> Employee Signature	<u>Samuel J. Palmer Jr</u> Reviewer Signature
<u>BRET PAULK</u> Rater Printed Name	<u>9/14/07</u> Date	<u>SAMUEL J. PALMER JR</u> Reviewer Printed Name
<u>9-14-07</u> Date		<u>9-14-07</u> Date
Initial if comments attached	Initial if comments attached	Initial if comments attached

It is recommended that the employee be:

- ☐ Continued in the probation (reason stated in Disciplinary Actions Area)
- ☒ Given permanent status in the position. Probationary increase to \$ 1014.50 Step 4 Effective 10/16/07
- ☐ Separated before or at the end of the probationary period (reason stated in Disciplinary Actions Area)

DJM-1m 09/21/07
APPOINTING AUTHORITY Signature Date

PROBATIONARY PERFORMANCE APPRAISAL SCORE: Locate the Responsibility Score on the back of this form and write it in the appropriate space. Locate the Disciplinary Score, also on the back of this form, and write it in the appropriate space. The Disciplinary Score is subtracted from the Responsibility Score to derive the Probationary Performance Appraisal Score. Documentation is to be maintained in the agency's personnel files if a "Does Not Meet" or "Consistently Exceeds" rating is given.

<u>28.9</u>	-	<u>"0"</u>	=	<u>28.9</u>
Responsibility Score		Disciplinary Score		Probationary Performance Appraisal Score

This employee's work:

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Does Not Meet Standards (6.6 or below)	Partially Meets Standards (6.7 - 16.6)	Meets Standards (16.7 - 26.6)	Exceeds Standards (26.7 - 36.6)	Consistently Exceeds Standards (36.7 - 40)

WORK HABITS: Check the appropriate space for each Work Habit area. Work Habits pertain to conduct occurring in this Appraisal period. Provide an explanation below for marking any work habit as "Unsatisfactory." Attach additional sheets if necessary. No disciplinary action has to be taken to mark a Work Habit "Unsatisfactory."

	Unsatisfactory	Satisfactory
Attendance	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Punctuality	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Cooperation with Coworkers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Compliance with Rules	<input type="checkbox"/>	<input checked="" type="checkbox"/>

BRET PAULK -- June 18th, 2008

1

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

LASHUNDRA
JACKSON,

Plaintiff,

CIVIL ACTION NO.
2:07-CV-645-MEF

vs.

STATE OF ALABAMA
DEPARTMENT OF
TRANSPORTATION,
JOE McINNES, in
his official
capacity as
DIRECTOR OF THE
STATE OF ALABAMA
DEPARTMENT OF
TRANSPORTATION,

Defendants.

* * * * *

DEPOSITION OF BRET PAULK,

taken pursuant to notice and
stipulation on behalf of the
Plaintiff, in the Ninth Division
Office of the Alabama Department of
Transportation, 1701 I-65 West Service
Road North, Mobile, Alabama, before
Karen Reagan Drinkard, AL-CCR #005,
Certified Court Reporter and Notary
Public in and for the State of Alabama
at Large, on June 18th, 2008,
commencing at 2:45 p.m.

REAGAN REPORTERS, LLC

334.262.7556

www.reaganreporters.com

DEFENDANT'S
EXHIBIT

31

BRET PAULK -- June 18th, 2008

124

1 Q. Okay. Did you ever tell Ms. Jackson
2 that she wouldn't move forward at
3 ALDOT in her condition?

4 (Off-the-Record discussion.)

5 A. No.

6 Q. Did you ever make any comments to her
7 about her chances for progress, her
8 being pregnant?

9 A. No.

10 Q. If she testifies that you did make a
11 comment like that, then that would
12 just be untrue?

13 A. Yes. That would be a lie.

14 Q. When she was transferred to Tony
15 Cooper, were you aware of anybody
16 having made a decision to recommend
17 her for termination?

18 A. I don't recall.

19 Q. When did you first become aware that
20 someone had recommended that she be
21 terminated?

22 A. I don't remember.

23 Q. How did you become aware of that?

STATE EMPL. EE'S MEMBERSHIP STATUS CHANGE

SUBSCRIBER
INFO

Name (Last, First, Middle Initial)

Weaver, Mary K.

SOCIAL SECURITY NO.

EFFECTIVE DATE
OF CHANGE4-17-03
(Month/Day/Year)

DROP DEPENDENT COVERAGE

- ☐ Change from Family to Single Coverage
- ☐ Cancel dependent(s) listed below from Family Coverage

(Month/Day/Year)

- ☐ Death _____
- ☐ Divorce _____
- ☐ Child Married _____
- ☐ Other _____

ADDITIONS - Provide Documentation

(270-day waiting period for pre-existing conditions. Exception: Open Enrollment)

- ☐ Change from Single to Family Coverage Add Dependent(s)
- ☒ Add dependent(s) listed below to Family Coverage
- ☐ Adding Former State Employee;

Former Employee's Social Security # _____

Last work day: _____

Last Name	First Name	Initial	Relationship to Employee	Birth Date	Social Security Number
			<input type="checkbox"/> Husband <input type="checkbox"/> Wife		
Weaver,	Deryl	T.	<input type="checkbox"/> Son <input type="checkbox"/> Stepson <input checked="" type="checkbox"/> Daughter <input type="checkbox"/> Stepdaughter	4-17-03	
			<input type="checkbox"/> Son <input type="checkbox"/> Stepson <input type="checkbox"/> Daughter <input type="checkbox"/> Stepdaughter		
			<input type="checkbox"/> Son <input type="checkbox"/> Stepson <input type="checkbox"/> Daughter <input type="checkbox"/> Stepdaughter		
			<input type="checkbox"/> Son <input type="checkbox"/> Stepson <input type="checkbox"/> Daughter <input type="checkbox"/> Stepdaughter		
			<input type="checkbox"/> Other Relationship		
			<input type="checkbox"/> Other Relationship		

Dependent premium for the period _____ through _____ (Check must be attached) \$ _____

- ☐ Cancel Subscriber's coverage (part-time employees only)

Work Telephone Number _____

AFFIRMATION AND RELEASE

I hereby affirm that I have completely read and fully understand the terms and conditions of this form. I attest that all the representations made by me on this form are true and correct. I understand that any misrepresentation may result in the forfeiture of insurance coverage and that I will be personally liable for all claims related to such misrepresentation. I further understand that there is mandatory utilization review and I do hereby give permission to release any information necessary to evaluate, administer, and process claims for benefits to any person, entity, or representative acting on the State's behalf.

Mary K. Weaver
Employee Signature

4-17-03
Date

- ☐ Change Address

Street Address _____

Apartment Number _____

City _____ County _____ State _____ ZIP _____

Barbara Paul Stickland
Signature of Payroll Clerk (Required to verify any payroll action taken) Date _____

State Agency: _____

Transportation

